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June 2, 2017

**Via First Class Mail
And Electronic-Case Filing**

Hon. Ramon E. Reyes, Jr.
United States Magistrate Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East, Courtroom: 2E (North Wing)
Brooklyn, NY 11201

**Re: Joint Status Report
Muchmore's Cafe, LLC v. City of New York
Index No. 14-cv-5668 (RRM) (RER)**

Your Honor:

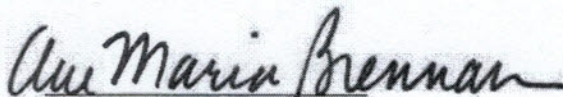
This firm serves as counsel to Plaintiff Muchmore's Cafe, LLC in the above-captioned action. Pursuant to the Order of this Court dated May 24, 2017, the parties submit this Joint Status Report to the Court.


Each party has produced its Initial Disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure. The City has responded to plaintiff's notice for discovery and inspection of documents and has indicated it is still collecting electronic material which will then be reviewed for relevancy and/or privilege. Responsive, non-privileged material will be produced on a rolling basis. Both parties are currently reviewing documents that have been produced and may make supplemental requests, if necessary. Recently, the City served interrogatories and requests for discovery of documents on the plaintiff.

While the City has expressed concern as to its ability to complete document production within the existing discovery schedule, the plaintiff hopes to adhere to the existing schedule. If the City needs to seek an adjustment to the current schedule, or bring other matters to the Court's attention, it will do so as soon as practicable. The parties are working together in good faith to complete discovery and no discovery disputes exist at this time.

If the Court has any questions concerning the status of discovery, the parties are available for a conference call. While we do not believe a telephone conference is necessary at this time, the plaintiff suggests that scheduling a telephone status conference for July may be appropriate.

Respectfully submitted,


Ave Maria Brennan, Esq.


Andrew Muchmore, Esq.